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Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91197518
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Correspondence Address	JILL K TOMLINSON COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES jkt@cll.com, trademark@cll.com, rar@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Scott P. Ceresia
Filer's e-mail	spc@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Scott P. Ceresia/
Date	04/03/2012
Attachments	MATHLETICS - Motion to Suspend (April 3, 2012).pdf (3 pages)(11263 bytes)

Ref. No. 21307.034 TRADEMARK

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of three (3) months, until **July 3, 2012**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made toward a resolution of this matter. Since the last suspension,
Opposer's in-house counsel reviewed Applicant's response to Opposer's revised settlement
terms, and communicated its feedback to Opposer's outside counsel. Subsequently, Opposer's
outside counsel and Applicant's counsel conducted a call in which the parties further discussed
settlement and narrowed the remaining issues to be negotiated. The additional time is requested
to allow Applicant's counsel the time to submit revised settlement terms to Applicant for
consideration, and for the parties to continue negotiating a potential settlement of this matter.

If the Board grants this motion, the parties request that six months of discovery be

allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes so

that the parties will have the full period of discovery in the event that the matter is not able to be

resolved. The trial and other periods should be reset accordingly.

Dated: New York, New York

April 3, 2012

COWAN LIEBOWITZ & LATMAN, P.C.

Attorneys for Opposer

By: /Scott P. Ceresia/

Mary L. Kevlin Richard S. Mandel

Scott P. Ceresia

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on April 3, 2012, I caused a true and correct copy of the foregoing MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED to be sent via First Class Mail, postage prepaid, to Applicant's attorney of record and correspondent, Barry F. Soalt, Esq., Procopio Cory Hargreaves & Savitch LLP, 525 B Street, Suite 2200, San Diego, CA 92101.

/Scott P. Ceresia/	
Scott P. Ceresia	•